

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 11-02763 (CGM)

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

INTELIGO BANK LTD., F/K/A BLUBANK LTD.,

Defendant.

Adv. Pro. No. 11-02763 (CGM)

**INTELIGO BANK'S MOTION TO DISMISS**

Heather Lamberg (HLamberg@winston.com)  
Christopher D. Man (CMan@winston.com)  
WINSTON & STRAWN  
1901 L Street, NW  
Washington, DC 200036  
(202) 282-5274 (phone)  
(202) 282-5100 (fax)

**PLEASE TAKE NOTICE,** that pursuant to Federal Rule of Civil Procedure 12(b)(6) and 12(b)(12), Defendant Inteligo Bank Ltd., moves this Court for an Order to dismiss plaintiff Trustee of Bernard L. Madoff Investment Securities LLC (BLMIS)'s Complaint on grounds including that (1) the Court lacks personal jurisdiction over Inteligo Bank; (2) the Plaintiff has failed to state a claim under the mere conduit defense; and (3) the Plaintiff has failed to state a claim under the 11 U.S.C. § 546(e) safe harbor. In support, Inteligo Bank submits its Memorandum of Law dated June 27, 2022, which is being filed contemporaneously with this motion.

New York, New York

Date: June 27, 2022

/s/ Heather Lamberg

Heather Lamberg (HLamberg@winston.com)

Christopher D. Man (CMan@winston.com)

WINSTON & STRAWN

1901 L Street, NW

Washington, DC 200036

(202) 282-5274 (phone)

(202) 282-5100 (fax)